# Final Report: Nevada Child and Family Services Review Executive Summary

This document presents the findings of the Child and Family Services Review (CFSR) for the State of Nevada. The CFSR assesses State performance on seven child welfare outcomes pertaining to children's safety, permanency, and well being and on seven systemic factors related to the State's capacity to achieve positive outcomes for children and families. The Nevada CFSR was conducted the week of February 23, 2004. At that time, the State was in the process of "integration," which involves a transition from a "bifurcated" child welfare system, in which the State child welfare agency is responsible for children in foster care in the State, while the two largest counties are responsible for child protective services (CPS), to a system in which the two largest counties are responsible for both CPS and foster care functions. Washoe County was fully integrated on January 1, 2003. The final phase of integration for Clark County will be completed on October 1, 2004.

The Nevada CFSR findings were derived from the following documents and data collection procedures:

- The Statewide Assessment, prepared by the State child welfare agency the Division of Child and Family Services (DCFS);
- The State Data Profile, prepared by the Children's Bureau of the U.S. Department of Health and Human Services, which provides State child welfare data for the years 2000 through 2002;
- Reviews of 49 cases at three sites in the State (Clark County [Las Vegas], Carson City, and Washoe County [Reno]).
- Interviews or focus groups (conducted at all three sites and at the State level) with stakeholders including, but not limited to children, parents, foster parents, all levels of child welfare agency personnel, Tribal representatives, collaborating agency personnel, service providers, court personnel, and attorneys.

The Nevada CFSR found that the State is not in substantial conformity with the seven child welfare outcomes assessed through the CFSR. In addition, performance was low (i.e., less than 75% substantially achieved) on all of the outcomes assessed. With regard to safety outcomes, key CFSR findings indicate that DCFS is not consistent in responding to maltreatment reports in a timely manner or establishing face-to-face contact with an alleged child victim in a reasonable timeframe. CFSR findings also indicate that DCFS is not consistent in (1) providing services to children and families to ensure children's safety while they remain in the home, or (2) addressing risk of harm to children by monitoring case progress through ongoing safety and risk assessment. In addition, case reviews and the State Data Profile indicate that DCFS experiences challenges in preventing maltreatment recurrence within a 6-month period.

With regard to permanency outcomes, key CFSR findings indicate that DCFS is not consistent in its efforts to achieve permanency for children in a timely manner or ensure that children in foster care experience placement stability. Identified barriers to achieving timely permanency were (1) a frequent practice of the courts and the agency of maintaining the goal of reunification even when the prognosis

is poor; (2) agency-related delays in preparing the paperwork necessary for TPR or for transfer to the adoption unit; (3) a reluctance to seek TPR if the child is not in an adoptive home; (4) a lack of available services to promote reunification; and (5) a lack of understanding of concurrent planning by the agency workers, courts, biological parents, and foster parents. CFSR case reviews also found that DCFS is not consistent in making concerted efforts to support or maintain a strong relationship between parents and children through providing sufficient visitation or through other efforts.

The lowest performance on the outcomes was found for Well-Being Outcome 1 (Families have enhanced capacity to provide for children's needs). Key concerns identified pertained to a lack of consistency with regard to meeting the service needs of children and parents, involving parents in case planning, and establishing contact between caseworkers and the children and parents in their caseloads with sufficient frequency to ensure children's safety and well-being. Another concern was noted with regard to Well-being Outcome 3 (Children receive services to meet their physical and mental health needs) with regard to a lack of sufficient attention to meeting children's mental health needs. Stakeholders noted that the State is in a "crisis" due to the fact that the Medicaid system is not reimbursing doctors for services due to an ongoing problem with Medicaid's automated system, and consequently doctors are refusing to see Medicaid patients.

With regard to the systemic factors, the CFSR determined that the State was in substantial conformity with the factors of Statewide Information System; Training; Agency Responsiveness to the Community; and Foster and Adoptive Parent Licensing, Recruitment, and Retention. The State did not achieve substantial conformity with the systemic factors of Case Review System, Quality Assurance System, or Service Array.

The overall findings with regard to the State's performance on the safety and permanency outcomes are presented in table 1 at the end of the Executive Summary. Findings regarding well-being outcomes are presented in table 2. Table 3 presents the State's performance relative to the national standards and table 4 provides information pertaining to the State's substantial conformity with the seven systemic factors assessed through the CFSR. A summary of major findings for each outcome and systemic factor is presented below.

#### I. KEY FINDINGS RELATED TO OUTCOMES

# Safety Outcome 1: Children are first and foremost protected from abuse and neglect

Safety Outcome 1 incorporates two indicators. One pertains to the timeliness of initiating a response to a child maltreatment report (item 1), and the other relates to whether children experience a recurrence of substantiated or indicated maltreatment (item 2).

Nevada did not achieve substantial conformity with Safety Outcome 1. This determination was based on the following findings:

- The outcome was substantially achieved in 69.6 percent of the cases reviewed, which is less than the 90 percent required for a rating of substantial conformity.
- The State did not meet the national standard for the percentage of children experiencing more than one substantiated or indicated child maltreatment report within a 6-month period.

However, Nevada did meet the national standard for the percentage of children experiencing maltreatment by a foster care provider or facility staff member. The State Data Profile indicates that there were 9 (0.17 percent) substantiated reports of maltreatment in foster homes or facilities in CY 2002.

Performance on this outcome did not vary substantively (i.e., more than 20 percent) across CFSR sites. The outcome was determined to be substantially achieved in 80 percent of Carson City cases, 70 percent of Washoe County cases, and 65 percent of Clark County cases.

A key CFSR finding is that DCFS is not consistent with regard to initiating investigations of child maltreatment reports or establishing face-to-face contact with the child subject of the report in accordance with the State-established timeframes or within reasonable timeframes. One concern identified pertained to the finding that the State does not have a uniform policy regarding responding to child maltreatment reports, and in Clark County, there is no time requirement for establishing face-to-face contact with the alleged child victim. In addition, both the State Data Profile and case reviews indicate that DCFS is not effective in preventing recurrence of child maltreatment within a 6-month period. Repeat maltreatment within a 6-month period occurred in 9 (43 percent) of the 21 cases in which there was at least 1 substantiated maltreatment report during the period under review.

# Safety Outcome 2: Children are safely maintained in their homes when possible and appropriate

Performance on Safety Outcome 2 is assessed through two indicators. One indicator (item 3) addresses the issue of the child welfare agency's efforts to prevent children's removal from their homes by providing services to the families that ensure children's safety while they remain in their homes. The other indicator (item 4) pertains to the child welfare agency's effectiveness in reducing risk of harm to children.

Nevada did not achieve substantial conformity with Safety Outcome 2. This determination was based on the finding that the outcome was substantially achieved in 62.5 percent of the applicable cases reviewed, which does not meet the 90 percent required for a rating of substantial conformity.

Performance on this outcome did not differ substantively across CFSR sites. The outcome was rated as a Strength in 67 percent of Washoe County cases, 65 percent of Clark County cases, and 50 percent of Carson City cases.

Key concerns identified during the CFSR were (1) inconsistencies with regard to providing services to children to ensure their safety while in their homes; (2) instances of removing children from the home without conducting a safety assessment to determine whether they might be able to remain at home; (3) a lack of consistent ongoing safety and risk assessments to monitor case progress; (4) a lack of a safety and risk assessment at case closure, leaving children at home still at risk of harm; (5) frequent use of relatives as temporary guardians without providing services to the family or the relatives; and (6) the primary shelter facility in Clark County is not licensed by either the State or the county.

## Permanency Outcome 1: Children have permanency and stability in their living situations.

There are six indicators incorporated in the assessment of permanency outcome 1, although not all of them are relevant for all children. The indicators pertain to the child welfare agency's effectiveness in preventing foster care re-entry (item 5), ensuring placement stability for children in foster care (item 6), and establishing appropriate permanency goals for children in foster care in a timely manner (item 7). Depending on the child's permanency goal, the remaining indicators focus on the child welfare agency's success in achieving permanency goals (such as reunification, guardianship, adoption, and permanent placement with relatives) in a timely manner (items 8 and 9), or whether children who have "other planned living arrangements" as a case goal are in stable placements and adequately prepared for eventual independent living (item 10).

Nevada did not achieve substantial conformity with Permanency Outcome 1. This determination was based on the following findings:

- The outcome was substantially achieved in 54.2 percent of the cases, which is less than the 90 percent required for substantial conformity.
- The State Data Profile indicates that for fiscal year (FY) 2002, the State did not meet the national standard for the percentage of children adopted who achieved a finalized adoption within 24 months of entry into foster care.
- Although data in the State Data Profile indicate that the State meets the national standard for the percentage of children in foster care for less than 12 months who experienced no more than 2 placements, the State agrees that because of excessive missing data it does not meet the national standard for this measure.

The FY 2002 data provided in the State Date Profile indicate that the State meets the national standards for (1) the percentage of children entering foster care who were re-entering within 12 months of a prior foster care episode and (2) the percentage of children reunified from foster care who were reunified within 12 months of the most recent entry into foster care.

Performance on this outcome was generally quite low across sites and there was little variation. The outcome was determined to be substantially achieved in 60 percent of Carson City cases, 54 percent of Clark County cases, and 50 percent of Washoe County cases.

A key finding of the CFSR case review was that the child welfare agency is effective in preventing re-entry into foster care (item 5). However, all other indicators for this outcome were rated as an Area Needing Improvement. Case reviewers determined that the child welfare agency was not consistent in its efforts to (1) ensure children's placement stability while in foster care (item 6), (2) establish appropriate permanency goals in a timely manner (item 7), and (3) achieve children's permanency goals in a timely manner (items 8, 9, and 10). Although the State met the national standard for the percentage of children reunified within 12 months of entry into foster care, the case review rated time-to-reunification (or guardianship) as a Strength in only 58 percent of the 19 applicable cases. Subsequent to the onsite review, the State agreed to accept the results of the case record review over the data profile.

Information from the case reviews and stakeholder interviews suggests that key barriers to attaining permanency in a timely manner are (1) a frequent practice of the courts and the agency of maintaining the goal of reunification even when the prognosis is poor; (2) agency-related delays in preparing the paperwork necessary for TPR or for transfer to the adoption unit; (3) a reluctance to seek TPR if the child is not in an adoptive home; (4) a lack of available services to promote reunification; and (5) a lack of understanding of concurrent planning by the agency workers, courts, biological parents, and foster parents.

## Permanency Outcome 2. The continuity of family relationships and connections is preserved for children.

Permanency Outcome 2 incorporates six indicators that assess the child welfare agency's performance with regard to (1) placing children in foster care in close proximity to their parents and close relatives (item 11); (2) placing siblings together (item 12); (3) ensuring frequent visitation between children and their parents and siblings in foster care (item 13); (4) preserving connections of children in foster care with extended family, community, cultural heritage, religion, and schools (item 14); (5) seeking relatives as potential placement resources (item 15); and (6) promoting the relationship between children and their parents while the children are in foster care (item 16).

Nevada did not achieve substantial conformity with Permanency Outcome 2. This determination was based on the finding that the outcome was rated as substantially achieved in 54.2 percent of the cases, which is less than the 90 percent required for substantial conformity.

Performance on this outcome did not differ substantively across CFSR sites. The outcome was determined to be substantially achieved in 60 percent of Carson City cases, 54 percent of Clark County cases, and 50 percent of Washoe County cases.

CFSR case review findings indicate that the child welfare agency makes concerted efforts to place children in close proximity to their families and to place siblings together when appropriate. However, the findings also indicate a lack of consistent effort on the part of the agency to (1) promote frequent visitation between children and their parents and siblings in foster care, (2) seek and assess relatives as placement resources, (3) preserve children's connections to their families and heritage, and (4) support or promote the parent-child relationship.

## Well Being Outcome 1: Families have enhanced capacity to provide for their children's needs.

Well Being Outcome 1 incorporates four indicators. One pertains to the child welfare agency's efforts to ensure that the service needs of children, parents, and foster parents are assessed and that the necessary services are provided to meet identified needs (item 17). A second indicator examines the child welfare agency's effectiveness with regard to actively involving parents and children (when appropriate) in the case planning process (item 18). The two remaining indicators examine the frequency and quality of caseworker's contacts with the children in their caseloads (item 19) and with the children's parents (item 20).

Nevada did not achieve substantial conformity with Well-Being Outcome 1. This determination was based on the finding that the outcome was rated as substantially achieved in 38.8 percent of the cases reviewed, which is less than the 90 percent required for substantial conformity.

Although performance on this outcome was low in all sites, there was variation across CFSR sites. The outcome was determined to be substantially achieved in 55 percent of Carson City cases and 50 percent of Washoe County cases, compared to 27 percent of Clark County cases.

A key CFSR finding is that all indicators for Well-Being Outcome 1 were rated as an Area Needing Improvement. Case reviews found that the child welfare agency is not consistent in its efforts to assess children and families for services and provide necessary services, involve parents and children in the case planning process, and establish sufficient face-to-face contact between agency case workers and the children and parents in their caseloads.

# Well-Being Outcome 2: Children receive appropriate services to meet their educational needs.

There is only one indicator for Well-Being Outcome 2. It pertains to the child welfare agency's effectiveness in addressing and meeting the educational needs of children in both foster care and in-home services cases (item 21).

Nevada did not achieve substantial conformity with Well-Being Outcome 2. This determination is based on the finding that the outcome was achieved in 70.4 percent of the cases reviewed, which does not meet the 90 percent required for substantial conformity. Performance on this outcome varied across CFSR sites. The outcome was determined to be substantially achieved in 87.5 percent of Carson City cases and 83 percent of Washoe County cases, compared to 54 percent of Clark County cases.

The primary CFSR finding was that the child welfare agency is not consistently addressing children's education-related needs even when there is evidence indicating that some type of intervention is warranted.

## Well-Being Outcome 3: Children receive adequate services to meet their physical and mental health needs.

This outcome incorporates two indicators that assess the child welfare agency's efforts to meet children's physical health (item 22) and mental health (item 23) needs.

Nevada did not achieve substantial conformity with Well-Being Outcome 3. This determination was based on the finding that the outcome was rated as substantially achieved in 64.4 percent of the applicable cases, which is less than the 90 percent required for substantial conformity.

Performance on this outcome varied across CFSR sites. The outcome was determined to be substantially achieved in 76 percent of Clark County cases, compared to 50 percent of Carson City and Washoe County cases.

The CFSR case reviews found that the child welfare agency was not consistently effective in meetings children's physical and mental health needs. A key concern identified was the lack of providers who will accept Medicaid for both physical and mental health services. Stakeholders noted that the State is in a "crisis" due to the fact that the Medicaid system is not reimbursing doctors for services (due to an ongoing problem with Medicaid's automated system) and consequently doctors are refusing to see Medicaid patients.

#### II. KEY FINDINGS RELATED TO SYSTEMIC FACTORS

## **Statewide Information System**

Substantial conformity with the systemic factor of Statewide Information System is determined by whether the State is operating a Statewide information system that can identify the status, demographic characteristics, location, and goals for children in foster care (item 24).

Nevada is in substantial conformity with the systemic factor of Statewide Information System because the CFSR determined that Nevada's Statewide information system, UNITY, can identify the status, demographics, location, and goals for children in foster care.

# **Case Review System**

Five indicators are used to assess the State's performance with regard to the systemic factor of Case Review System. The indicators examine the development of case plans and parent involvement in that process (item 25), the consistency of 6-month case reviews (item 26) and 12-month permanency hearings (item 27), the implementation of procedures to seek termination of parental rights (TPR) in accordance with the timeframes established in the Adoption and Safe Families Act (ASFA) (item 28), and the notification and inclusion of foster and pre-adoptive parents and relative caregivers in case reviews and hearings (item 29).

Nevada is not in substantial conformity with the systemic factor of Case Review System. Although CFSR findings indicate that 6-month case reviews and 12-month permanency hearings are being held in a timely manner, stakeholder comments and case review findings indicate that case plans are not routinely developed jointly with the child's parents, are too generic, do not address the needs of the child, and are not completed in a timely manner. The CFSR also found that (1) although Nevada has a statutory requirement for termination of parental rights (TPR) proceedings, there are excessive delays that preclude meeting the ASFA provisions pertaining to the timeliness of these proceedings; and (2) there is no Statewide, consistent process to notify foster or pre-adoptive parents and relative caregivers of review or hearing dates or to afford them an opportunity to be heard at these hearings.

# **Quality Assurance System**

Performance with regard to the systemic factor of Quality Assurance System is based on whether the State has developed standards to ensure the safety and health of children in foster care (item 30), and whether the State is operating a statewide quality assurance system that evaluates the quality and effectiveness of services and measures program strengths and areas needing improvement (item 31).

Nevada is not in substantial conformity with the systemic factor of Quality Assurance System. The CFSR determined that (1) the State has not developed and implemented procedures to ensure that children in foster care are provided quality services that protect the safety and health of the children, and (2) the State does not have a comprehensive Quality Assurance System that measures program strengths and areas needing improvement on a Statewide basis, although various, limited-focus reviews and evaluations conducted at either the State or county level were identified during the CFSR. Additionally, stakeholders expressed concerns that the standards established for foster family homes and child care institutions are not applied to the primary shelter facility in Clark County.

# **Training**

The systemic factor of Training incorporates an assessment of the State's new caseworker training program (item 32), ongoing training for child welfare agency staff (item 33), and training for foster and adoptive parents (item 34).

Nevada is in substantial conformity for the systemic factor of Training. The State has a formal initial training program for all new child welfare workers that includes a shadowing and mentoring component; requires ongoing training for staff and supervisors; and provides training for current or prospective foster parents, adoptive parents, and staff of licensed facilities that care for children. However, it is noted that there are no child welfare program specific supervisory training requirements and there is no administrative support for either case workers or supervisors to attend ongoing training.

## **Service Array**

The assessment of the systemic factor of Service Array addresses three questions: (1) Does the State have in place an array of services to meet the needs of children and families served by the child welfare agency (item 35)? (2) Are these services accessible to families and children throughout the State (item 36)? (3) Can services be individualized to meet the unique needs of the children and family served by the child welfare agency (item 37)?

Nevada did not achieve substantial conformity with the systemic factor of Service Array. The CFSR determined that the State does not have in place a sufficient array of services that would enable children to remain safely with their parents when reasonable or would help children in foster and adoptive placements achieve permanency. Critical gaps in the service array are bilingual services (particularly Spanish services), mental health services, substance abuse services, and health and dental services (because many providers will not accept Medicaid). In addition, the Statewide Assessment and stakeholder interviews indicate that many services are not available at all in rural areas of the State. Finally, the CFSR found that DCFS does not have a sufficient service array to ensure that workers are able to individualize services for children and families served by the agency.

## **Agency Responsiveness to the Community**

Performance with regard to the systemic factor of Agency Responsiveness to the Community incorporates an assessment of the State's consultation with external stakeholders in developing the Child and Family Services Plan (items 38 and 39), and the extent to which the State coordinates child welfare services with services or benefits of other Federal or federally-assisted programs serving the same population (item 40).

Nevada is in substantial conformity with the systemic factor of Agency Responsiveness to the Community. The CFSR determined that DCFS engages many stakeholders in the process of developing the Child and Family Services Plan and in preparing the annual reports of progress. In addition, the CFSR found multiple examples of State efforts to coordinate services with other Federal or Federally-funded programs.

# Foster and Adoptive Parent Licensing, Recruitment, and Retention

The assessment of this systemic factor focuses on the State's standards for foster homes and child care institutions (items 41 and 42), the State's compliance with Federal requirements for criminal background checks for foster and adoptive parents (item 43), the State's efforts to recruit foster and adoptive parents that reflect the ethnic and racial diversity of foster children (item 44), and the State's activities with regard to using cross-jurisdictional resources to facilitate permanent placements for waiting children.

Nevada is in substantial conformity with the systemic factor pertaining to Foster and Adoptive Parent Licensing, Recruitment and Retention. The CFSR determined that State licensing standards are applied consistently to foster family homes or child care institutions receiving title IV-E or IV-B funds and that Nevada completes criminal records checks in foster and adoptive homes before placing children in the home. There is a concern that there is a need to recruit more Hispanic and Spanish-speaking families, more therapeutic homes, and more foster and adoptive families for older youth.

The CFSR determined that there are processes in place for the effective use of cross-jurisdictional resources to facilitate adoptive or permanent placements for waiting children.

Table 1. Nevada CFSR Ratings for Safety and Permanency Outcomes and Items

Outcomes and Indicators		<b>Outcome Ratin</b>	gs		Item Rati	tings
	In Substantial Conformity?	Percent Substantially Achieved*	Met National Standards?	Rating**	Percent Strength	Met National Standards
Safety Outcome 1-Children are first and foremost, protected			Met 1, did			
from abuse and neglect	No	69.6	not meet 1			
Item 1: Timeliness of investigations				ANI	74	
Item 2: Repeat maltreatment				ANI	80	No
Safety Outcome 2 - Children are safely maintained in their						
homes when possible and appropriate	No	62.5				
Item 3: Services to prevent removal				ANI	80	
Item 4: Risk of harm				ANI	67	
Permanency Outcome 1- Children have permanency and			Met 2, did			
stability in their living situations	No	54.2	not meet 2			
Item 5: Foster care re-entry				Strength	92	Yes
Item 6: Stability of foster care placements				ANI	62.5	No
Item 7: Permanency goal for child				ANI	71	
Item 8: Reunification, guardianship and placement with relatives				ANI	58	Yes***
Item 9: Adoption				ANI	33	No
Item 10: Other planned living arrangement				ANI	50	110
Permanency Outcome 2 - The continuity of family				ANI	30	
relationships and connections is preserved	No	54.2				L
Item 11: Proximity of placement	110	54.2		Strength	100	
Item 12: Placement with siblings				Strength	87	
Item 13: Visiting with parents and siblings in foster care				ANI	71	
Item 14: Preserving connections				ANI	79	
Item 15: Relative placement				ANI	77	
Item 16: Relationship of child in care with parents				ANI	57	

<sup>\*90</sup> percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for the State to be in substantial conformity with the outcome.

<sup>\*\*</sup>Items may be rated as a Strength or an Area Needing Improvement (ANI).

<sup>\*\*\*</sup>State agreed to accept results of case record review over data profile.

Table 2. Nevada CFSR Ratings for Child and Family Well Being Outcomes and Items

Outcomes and Indicators	Outcome Ratings		Item Ratings			
	In Substantial Conformity?	Percent Substantially Achieved*	Met National Standards	Rating**	Percent Strength	Met National Standards
Well Being Outcome 1 - Families have enhanced capacity to						
provide for children's needs	No	38.8				
Item 17: Needs/services of child, parents, and foster						
parents				ANI	51	
Item 18: Child/family involvement in case planning				ANI	47	
Item 19: Worker visits with child				ANI	55	
Item 20: Worker visits with parents				ANI	46	
Well Being Outcome 2 - Children receive services to meet						
their educational needs	No	70.4				
Item 21: Educational needs of child				ANI	70	
Well Being Outcome 3 - Children receive services to meet						
their physical and mental health needs	No	64.4				
Item 22: Physical health of child				ANI	82	
Item 23: Mental health of child				ANI	62	

<sup>\*90</sup> percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for the State to be in substantial conformity with the outcome.

<sup>\*\*</sup>Items may be rated as a Strength or an Area Needing Improvement (ANI).

Table 3: Nevada Performance on the Six Outcome Measures for Which National Standards have been Established

Outcome Measure	National Standard	Nevada Data FY 2002
Of all children who were victims of a substantiated or indicated maltreatment report in the first 6 months of CY 2001, what percent were victims of another substantiated or indicated report within a 6-month period?	6.1% or less	7.6%
Of all children who were in foster care in the first 9 months of CY 2001, what percent experienced maltreatment from foster parents or facility staff members?	0.57% or less	0.17%
Of all children who entered foster care in FY 2001, what percent were re-entering care within 12 months of a prior foster care episode?	8.6% or less	6.9%
Of all children reunified from foster care in FY 2001, what percent were reunified within 12 months of entry into foster care?	76.2% or more	90.9%*
Of all children who were adopted from foster care in FY 2001, what percent were adopted within 24 months of their entry into foster care?	32.0% or more	29.2%
Of all children in foster care during FY 2001 for less than 12 months, what percent experienced no more than 2 placement settings?	86.7% or more	94.9%**

<sup>\*</sup>The State agreed to accept results of the case record review over the data profile.

<sup>\*\*</sup>The State reported that because of excessive missing data it is unlikely that the State would meet the national standard for this measure.

Table 4: Nevada CFSR Ratings for the Seven Systemic Factors

Systemic Factors	In Substantial Conformity?*	Rating**
IV. Statewide Information System	Yes (3)	
Item 24: System can identify the status, demographic characteristics, location and goals of children in foster care		Strength
V. Case Review System	No (2)	
Item 25: Process for developing a case plan and for joint case planning with parents		ANI
Item 26: Process for 6-month case reviews		Strength
Item 27: Process for 12-month permanency hearings		Strength
Item 28: Process for seeking TPR in accordance with ASFA		ANI
Item 29: Process for notifying caregivers of reviews and hearings and for opportunity for them to be heard		ANI
VI. Quality Assurance System	No (2)	
Item 30: Standards to ensure quality services and ensure children's safety and health		ANI
Item 31: Identifiable QA system that evaluates the quality of services and improvements		ANI
VII. Training	Yes (3)	
Item 32: Provision of initial staff training		Strength
Item 33: Provision of ongoing staff training that addresses the necessary skills and knowledge.		ANI
Item 34: Provision of training for caregivers and adoptive parents that addresses the necessary skills and knowledge		Strength
VIII. Service Array	No (2)	
Item 35: Availability of array of critical services		ANI
Item 36: Accessibility of services across all jurisdictions		ANI
Item 37: Ability to individualize services to meet unique needs		ANI
IX. Agency Responsiveness to the Community	Yes (3)	
Item 38: Engages in ongoing consultation with critical stakeholders in developing the CFSP		Strength
Item 39: Develops annual progress reports in consultation with stakeholders		Strength
Item 40: Coordinates services with other Federal programs		Strength
X. Foster and Adoptive Parent Licensing, Recruitment and Retention	Yes (3)	
Item 41: Standards for foster family and child care institutions		Strength
Item 42: Standards are applied equally to all foster family and child care institutions		Strength
Item 43: Conducts necessary criminal background checks		Strength
Item 44: Diligent recruitment of foster and adoptive families that reflect children's racial and ethnic diversity		ANI
Item 45: Uses cross-jurisdictional resources to find placements		Strength

<sup>\*</sup>Systemic factors are rated on a scale from 1 to 4. A rating of 1 or 2 indicates "Not in Substantial Conformity." A rating of 3 or 4 indicates Substantial Conformity \*\*Items may be rated as a Strength or an Area Needing Improvement (ANI).